

# **Exhibit 2**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

J.H., by and through his next friend,  
Terina Gray; on behalf of himself  
and all persons similarly situated,

Plaintiff,

v.

HINDS COUNTY, MISSISSIPPI,

Defendant.

Case No. *3:11CV327-DPJ-FKB*

**DECLARATION OF TERINA GRAY**


I, Terina Gray, next friend and mother of the named plaintiff in this lawsuit, declare the following is true to the best of my knowledge.

1. My minor child, J.H., has been confined at Henley-Young Juvenile Justice Center in Hinds County for almost two weeks. J.H. was not allowed to call me when he arrived at Henley-Young and no one contacted me to inform me of his detention hearing. During his imprisonment, J.H. has received inadequate mental health and medical care services, been subjected to verbal abuse and has been confined to his cell for excessive periods of time, where he is forced to live in unsanitary conditions.

2. My son and I want to bring this lawsuit so that we can protect the children who are or who will be housed in Henley-Young. We both want to make sure that Hinds County will follow the law and stop violating the rights of children. We know that many other children have experienced the abuse that J.H. has suffered. We want to bring this lawsuit to help them.

3. My minor son and I will fairly and adequately represent the interests of all children who are currently, or who will be confined to Henley-Young.

On this, the 1st day of June 2011, I declare under penalty of perjury that the foregoing is true and correct.

By:   
Terina Gray  
4753 South Drive  
Jackson, MS 39209